

SCIARRA & CATRAMBONE, LLC
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Attorneys for Defendants Jeffrey Lancaster, Reynold Theriault, &
Policemen's Benevolent Association Mainland Local 77 (pledged as
"Mainland Local PBA 77")

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CHRISTOPHER LEARY, : CIVIL ACTION NO.
Plaintiff, : 1:23-cv-04070-JHR-SAK
vs. :
EGG HARBOR TOWNSHIP POLICE : CERTIFICATION OF COUNSEL
DEPARTMENT, THE TOWNSHIP OF EGG : IN SUPPORT OF MOTION
HARBOR, MAINLAND LOCAL PBA #77, : TO DISMISS PLAINTIFF'S
NEW JERSEY STATE ASSOCIATION OF : COMPLAINT IN LIEU OF
CHIEFS OF POLICE, STATE OF NEW : ANSWER PURSUANT TO
JERSEY, MICHAEL HUGHES, : F.R.C.P. 12(b) (6)
individually and acting under :
color of law, WILLIAM NALLY, :
individually and acting under :
color of law, JEFFREY LANCASTER, :
individually and acting under :
color of law, REYNOLD THERIAULT :
individually and acting under :
color of law, DONNA L MARKULIC, :
individually and acting under :
color of law, JOHN and JANE :
DOES 1-10, ABC CORPORATIONS, :
and XYZ STATE ENTITIES. :
Defendants. :
:

Jeffrey D. Catrambone, of full age, certifies as follows:

1. I am an attorney-at-law licensed to practice before this Court
and a Partner with the law firm of Sciarra & Catrambone, LLC.

My firm represents Defendants Jeffrey Lancaster, Reynold Theriault, & Policemen's Benevolent Association Mainland Local 77 ("Defendants") in the above-captioned matter. As such, I am fully familiar with the facts herein. I make this Certification in support of Defendants' Rule 12(b) (6) motion to dismiss Plaintiff's Complaint for failure to state a claim.

2. Attached hereto are true and accurate copies of the following:

EXHIBIT	DESCRIPTION
A	Plaintiff's Complaint filed with this Court on 7/30/23
B	Plaintiff's Complaint filed with PERC dated 7/28/23

I hereby certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Sciarra & Catrambone, LLC
Attorneys for Defendants
By: /s/ Jeffrey D. Catrambone (JC2870)

Dated: October 5, 2023